



ANACOSTIA WATERSHED SOCIETY

January 28, 2019

James R. Foster
President

Ms. Jillian Adair
Water Protection Division
Environmental Protection Agency
Region 3
1650 Arch Street,
Philadelphia, PA 19103-2029

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Re: Concern regarding non-floatable trash and the quality of trash data to revise the Anacostia River Trash Total Maximum Daily Loads (TMDLs)

Ms. Jillian Adair,

As you may know, the Anacostia Watershed Society (AWS) has been working for 30 years to protect and restore the Anacostia River and its watershed communities. Our vision is simple: a swimmable and fishable Anacostia River by 2025. In order to achieve that mission, the river must meet its water quality standards, including that for trash. I am writing this letter to express our concerns regarding the revision of the Anacostia River Trash Total Maximum Daily Load (TMDL).

Much of the attention given to trash in the Anacostia River focuses on floatable/snag-able items such as plastic bottles, plastic bags, food packaging, and Styrofoam. These items are unsightly, often toxic or dangerous to wildlife, and they clog infrastructure such as storm drains. Volunteer stream clean-ups usually focus on these floatable/snag-able items as they easily and frequently accumulate on streambanks. It is not surprising then that much legislative attention has focused on these types of items: plastic bag fees, polystyrene bans, etc. However, data collected by AWS at the Nash Run trash trap in the District of Columbia shows that about **70% of trash items (by count) are actually non-floatable (neutrally buoyant) items such as chip bags, cellophane, lids, straws, and cigarettes.** A small percentage of these items end up on streambanks, thus they are unlikely to be completely accounted for and removed at volunteer clean-ups. We believe that more attention should be given to non-floatable trash items generally and specifically in the redevelopment of the Anacostia trash TMDL.

Anacostia Watershed Society and the Metropolitan Washington Council of Governments (COG) were contracted in the development of the original trash TMDL, and the reports were published in 2010 to determine trash loading rates

for various land uses in the watershed. Both AWS and COG used a “total capture method” for data collection; mesh screens (1 inch grid) were installed on MS4 pipe outfalls that were able to capture almost all trash pieces during rain events. In our professional opinion, this methodology was and is the best available to ensuring all floatable and non-floatable items are accounted for in the data. **We urge EPA to use data collected only in this manner again in the redevelopment of the trash TMDL.** If volunteer shoreline cleanup data is a significant source of data to inform the new TMDL, this will result in a conservative underestimation of the trash loading in the river since most non-floatable trash will not be taken into consideration.

We greatly appreciate your attention paid to our concerns.

A handwritten signature in dark ink, appearing to read "James R. Foster". The signature is fluid and cursive, with a large initial "J" and "F".

James R. Foster
President
Anacostia Watershed Society